

# RABINOWITZ, LUBETKIN & TULLY, L.L.C.

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August 10, 2023

As noted in the Court's order on July 26, 2023, Dkt. No. 709, the hearing on August 14, 2023 will be on Plaintiff's Motion to Enforce. The Court will hear the parties on the Motion to Appoint a Receiver at a later date if the Court finds that KuRaku is an alter ego.


08/10/2023

Via ECF

Honorable Lewis J. Liman  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, New York 10007-1312

**Keawsri et al. v. Ramen Ya Inc. et al.**  
**Case No. 17-cv-2406**

Dear Judge Liman:

SO ORDERED.  
  
LEWIS J. LIMAN  
United States District Judge

As you know, this office represents Masahiko Negita and Yasuko Negita (collectively, the "Debtors") in connection their SubChapter V Chapter 11 bankruptcy case currently pending before the Honorable Stacey L. Meisel in the United States Bankruptcy Court, District of New Jersey. As you are also aware, this office also recently entered a limited appearance in the case pending before Your Honor, Keawsri et al. v. Ramen Ya, Inc. et al., Case No. 17-2406, for the limited purpose of opposing the Judgment Creditors' motion for the appointment of a receiver over the Debtors' restaurant, KuRaku NYC, which is owned 90% by Yasuko Negita and is managed by, among others, Masahiko Negita [Docket No. 675] (the "Receiver Motion").

At this time, we would appreciate it if Your Honor could clarify exactly what is scheduled to be heard on August 14, 2023. Specifically, we would like to know whether Your Honor expects to hear oral argument in connection with the Receiver Motion, as the docket does not currently reflect a hearing date. Additionally, we would appreciate clarification as to the procedural status of the Judgment Creditors' Motion to Enforce Judgment [Docket No. 632]. Specifically, whether the August 14, 2023 hearing is simply an evidentiary hearing, or whether Your Honor anticipates taking any other action in connection with that motion at that time.

Respectfully submitted,

RABINOWITZ, LUBETKIN & TULLY, LLC

  
Barry J. Roy

BJR:jc

Honorable Lewis J. Liman

August 10, 2023

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